

REMARKS

Applicants have now had an opportunity to carefully consider the comments set forth in the Office Action of February 28, 2007.

Reconsideration of the Application is requested.

The Office Action

Claims 1, 20, 39, 58 and 81-84 stand provisionally rejected on the ground of non-statutory obviousness-type double patenting as being unpatentable over claims 1, 16 and 31-32 of co-pending Application No. 10/626,856.

Claims 39, 58 and 81-84 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Claim 77 stands rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement, and 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 77-80 stand rejected under 35 U.S.C. §102(a) as being anticipated by Brown, Ralf D. "Dynamic Stopwording for Story Link Detection" (hereinafter Brown).

Claims 1-5, 9-10, 14-24, 28-29, 33-43, 47-48, 52-62, 66-67, 71-76 and 81-88 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,606,620 issued to Sundaresan et al. (hereinafter Sundaresan) in view of U.S. Patent No. 5,835,905 issued to Pirolli et al. (hereinafter Pirolli).

Claims 6-8, 25-27, 44-46 and 63-65 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sundaresan in view of Pirolli and further in view of U.S. Patent Application No. 2004/006559 by Gange et al. (hereinafter Gange).

Claims 11-13, 30-32, 49-51 and 68-70 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sundaresan in view of Pirolli and further in view of U.S. Patent Application No. 2004/002849 by Zhou (hereinafter Zhou).

The Double Patenting Rejections

Applicants again thank the Examiner for directing attention to the provisional double patenting rejection and note that once a patent issues with the asserted scope, Applicants will reevaluate the relevancy of the terminal disclaimer requirement, revise the scope of the pending application or take other appropriate

action.

The §101 Rejections

The present Office Action rejects 39, 58 and 81-84 under 35 U.S.C. §101. This rejection is respectfully traversed. Claim 39, as amended recites "displaying the link on a computer or storing the link in an information repository." Claims 58 and 83-84, as amended, recite similar structure. Claim 81, as amended, recites "determining and storing at least one predictive model in the memory based on the inter-story similarity vectors and the link label information." Claim 82, as amended, recites similar structure.

Applicants note that the above discussed structure of claims 39, 58 and 81-84, as amended, is consistent with the recited structure of claims 20 and 77 for which the Examiner has acknowledged that §101 rejections were overcome by amendments made in the response mailed December 8, 2006. Applicants therefore request the withdrawal of the 35 U.S.C. §101 rejection of claims 39, 58 and 81-84.

The §112 Rejections

The present Office Action rejects claim 77 under 35 U.S.C. §112, first paragraph, 35 U.S.C. §112, second paragraph. This rejection is respectfully traversed. The Examiner was unsure whether there was a distinction between the recited "first source mode" in claim 77 and the phrase "first mode" as recited in the specification. A similar uncertainty existed for the phrase "second source mode" versus "second mode." Applicants respectfully submit there is no difference between the questioned phrases however, Claim 77 has been amended herein to remove the word "source" from the phrase so that the claim recites language consistent with the specification. Claims 78 and 79 have also been amended to remain consistent with claim 77.

For the above-stated reasons, Applicants respectfully request the withdrawal of the 35 U.S.C. §112 rejections of claim 77

The §102 Art Rejections

The present Office Action rejects claims 77-80 under 35 U.S.C. §102(a) as being anticipated by Brown. This rejection is respectfully traversed. The cited section of Brown discusses using English language and Mandarin language sources and

then performing a single-pass incremental clustering method for a Topic Detection and Tracking (TDT) evaluation. Although the evaluation appears to evaluate similarities between the documents and members of existing clusters, the Examiner has not shown where Brown describes verifying, e.g., a language translation from one language to another.

Applicants note that paragraph 86 of the original application (par. 115 in the published application) describes examples of verification. In the one example, a transcription of speech utterances to text is verified. In the another example, other translations such as language translations are verified based on known translations such as, e.g., United Nations official reports. Claim 77, as amended, now recites "determining a verified first source-mode transformation of the source-identified training corpus text from a first source mode to a second source mode based on at least one of a verified transcription and a verified translation." The Examiner will note that the amended language is intended to describe the type of verification recited in the subject claim. As mentioned above, the Examiner has not shown where Brown describes this type of language translation or speech transcription verification.

For the above-stated reasons, Applicants respectfully request the withdrawal of the 35 U.S.C. §102(a) rejection of claim 77, as amended, and claims 78-80 depending therefrom.

The §103 Art Rejections

The present Office Action rejects claims 1-5, 9-10, 14-24, 28-29, 33-43, 47-48, 52-62, 66-67, 71-76 and 81-88 under 35 U.S.C. §103(a) as being unpatentable over Sundaresan in view of Pirolli. This rejection is respectfully traversed.

The Office Action states that Sundaresan describes the recited step of "determining link label information for the at least one story-pair" (col. 9, lines 8-9). The cited section of Sundaresan discusses a classifier. Further, Applicants note that Sundaresan is directed to the field of automated information retrieval in the context of document characterization (col. 1, lines 6-10). For example, a classifier may deal with documents dealing with resumes (col. 2, lines 11-14). The present application, on the other hand, as recited in independent claim 1, is directed to the subject of linked event detection. Link detection systems determine whether stories in news and radio broadcasts, newspaper articles and journal reports are about the same event (par. 3 of the present application). The Office Action has not shown where

Sundareson teaches that two documents having the same classification are indicated as being descriptive of the same event.

The above-described link label of the present application is an indicator of the existence of at least one link between a pair of stories, that they are related to the same event (par. 16). However, unlike the link label of the present application, although two documents may relate to the same subject matter, they may not relate to the same event according to the classification described by Sundareson. Independent claim 1, as amended, now recites a limitation for "determining link label information for the at least one story-pair, the link label information indicating the existence of at least one link between a pair of stories in the source-identified training stories and that the linked source-identified stories are related to the same event."

Independent claim 20, as amended, recites a limitation for "a processor that receives source-identified training stories and associated link label information for at least one story-pair via the input/output circuit, the link label information indicating the existence of at least one link between a pair of stories in the source-identified training stories." It also recites a limitation for "a predictive model determining circuit that determines and stores at least one predictive model in the memory based on the inter-story similarity vectors and the link label information."

Based on the discussion with reference to claim 1 regarding link labels, claim 20 also recites limitations for a system that detects stories related to the same event, rather than just to the same subject matter as described by Sundareson.

Similar to claims 1 and 20, each of independent claims 39, 58, and 81-84 also recite limitations regarding links between stories, the links indicating that the stories relate to the same event.

For the reasons set forth above, Applicants respectfully request that the Examiner withdraw the 35 U.S.C. §103(a) rejections of claims 1, 20, 39, 58, and 81-84, as amended. Applicant submits that claims 1, 20, 39, 58, and 81-84 and their respective dependent claims are patentably distinct over the references and in condition for allowance.

CONCLUSION

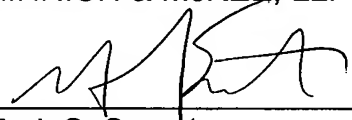
For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-88) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark Svat, at Telephone Number (216) 861-5582.

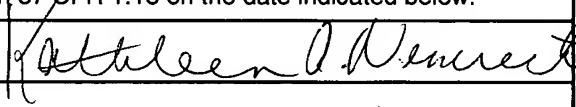
Respectfully submitted,

FAY, SHARPE, FAGAN,
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6/28/07
Date



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<input type="checkbox"/> transmitted to the USPTO by facsimile in accordance with 37 CFR 1.18 on the date indicated below.	
Express Mail Label No.:	Signature: 
Date: June 28, 2007	Name: Kathleen A. Nimrichter

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